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LETTER AND RESPONSE TO U S EPA REGION III COMMENTS ON DRAFT ACTION
MEMORANDUM FOR SOLID WASTE MANAGEMENT UNIT 3 (SWMU3) PIER 10
SANDBLAST YARD JEB LITTLE CREEK VA
12/11/2012
CH2MHILL



CH2M HILL
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December 11, 2012

USEPA Region 3
NPL/BRAC Federal Facilities Branch (3HS11)
Attn: Mr. Jeffrey Boylan
1650 Arch Street
Philadelphia, PA 19103-2029

Subject: Response to USEPA Region 3 Comments on the
Draft Action Memorandum for Solid Waste Management Unit 3 Pier 10 Sandblast Yard
Joint Expeditionary Base Little Creek, Virginia Beach, Virginia
Navy CLEAN 1000, Contract N62470-08-D-1000, Task Order WE07

Dear Mr. Boylan:

On behalf of the Navy, CH2M HILL is pleased to submit the following response to USEPA Region 3's comments received via email on December 11, 2012 on the *Draft Action Memorandum for Solid Waste Management Unit 3 Pier 10 Sandblast Yard, Joint Expeditionary Base Little Creek, Virginia Beach, Virginia* (CH2M HILL, October 2012):

Comment 1. Please add "floating" before "dry dock" throughout the document.

Response: Requested change made throughout the document.

Comment 2. Please delete the EPA signature section from the Declaration page; as EPA does not sign the Action Memorandum but will issue an approval letter after Navy signature.

Response: Requested change made.

Comment 3. Please edit NTCRA to reflect "None-Time Critical Removal Action" in the Acronyms and Abbreviations/I. Purpose sections of the document.

Response: Requested change made throughout the document.

Comment 4. In Section II, add the EPA ID# (CERCLIS ID) to this paragraph consistent with EPA action memorandum guidance. Looking at a previous ROD (Site 11a), the ID is "VA5170022482".

Response: The following sentence was added to the end of the paragraph: "The former NAB Little Creek was placed on the United States Environmental Protection Agency (USEPA) National Priorities List (NPL) May 10, 1999 (USEPA ID: VA5170022482)."

Comment 5. In Section II.A.4. last sentence, add "potentially unacceptable" before "risk", consistent with Section III.

Response: Requested change was made.

Comment 6. In Section IV. please change "environment" to "lower trophic ecological receptor" or some language more descriptive.

Response: The section was revised to read: "Actual or threatened releases of pollutants and contaminants from SWMU 3 sediment, if not addressed by implementing the response action discussed in this Action Memorandum, may present an endangerment to lower-trophic-level receptors (benthic macroinvertebrates)."

Comment 7. In Section V.A.2. please revise the first sentence to convey this NTCRA will address the potential unacceptable sediment risk from metals instead of referring to UU/UE. The final ROD for SWMU 3 is the document where the UU/UE language should be included. In the second to the last sentence add "surface water "after "soil,". Please delete the last sentence of this paragraph too.

Response: The 1st sentence was revised to read: "This NTCRA will mitigate potentially unacceptable ecological risks from exposure to sediment within the removal action area through removal of metals contaminated sediment." Additionally, surface water was added to the 2nd to last sentence. Per Navy comment received, the last sentence was revised to convey the removal actions contribution to the overall site remedy and now reads: "Removal of impacted sediment during the NTCRA will contribute to the effectiveness of the long-term site remedy by eliminating the exposure pathway and mitigate potentially unacceptable risks within approximately 57 percent of the site requiring remedial action under CERCLA."

Comment 8. In Section VI. please revise the first sentence to convey that unacceptable risk (both human and ecological) will remain at the site after the removal action. In the last sentence add "surface water" after "groundwater," and delete the remaining part of the sentence after "site".

Response: Previously in the document it has been stated that, "No potentially unacceptable human health risk was identified from exposure to groundwater, soil, surface water, or sediment"; therefore, the first sentence was revised to read: "Potential unacceptable ecological risk will remain at the site following the action...." The last sentence was revised to read: "The remaining sediment, groundwater, surface water, and soil will be addressed as part of the final remedy for the site."

The above response (and other Team comments/responses) will be incorporated into the final version of the SWMU 3 Action Memorandum.

Please do not hesitate to contact me at 757-671-6266 if you have any questions concerning this response.

Sincerely,



Cecilia Landin
Project Manager

cc: Mr. Bryan Peed/NAVFAC Mid-Atlantic
Mr. Paul Herman, P.E./VDEQ
Administrative Record File